

1 Joshua Sabert Lowther, Esq.
2 Ga. Bar # 460398
3 Admitted *Pro Hac Vice*
4 Lowther | Walker LLC
5 101 Marietta St., NW, Ste. 3650
6 Atlanta, GA 30303
404.406.4052
jlowther@lowtherwalker.com
www.lowtherwalker.com
6 Attorney for Defendant
Alexandra Gehrke

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

United States of America,
Plaintiff,
v.
Alexandra Gehrke, *et al.*,
Defendants

2:24-CR-001040-ROS-1

JOINT MOTION TO CONTINUE SENTENCING

Ms. ALEXANDRA GEHRKE and the UNITED STATES OF AMERICA, pursuant to Fed. R. Crim. P. 32, respectfully move this Court to continue the sentencing hearing in this case from February 11, 2025, to a date in, but not later than, August 2025.

I. Relevant Procedural History

On October 28, 2024, this Court scheduled the sentencing hearing in this case for February 11, 2025. (ECF No. 119.)

II. Factual Assertions

The parties diligently have prepared for sentencing in this complex health care fraud case, but upon conferring with each other, they respectfully submit that they need additional time to prepare for sentencing fully – they will be able to accomplish that preparation by August 2025, and they will be

1 available for sentencing that month.

2 This is the first request to continue sentencing in this case.

3 **III. Memorandum of Law**

4 A “court must impose sentence without unnecessary delay.” Fed. R.
5 Crim. P. 32(b)(1). However, a “court may, for good cause, change any time
6 limits prescribed in [Fed. R. Crim. P. 32].” Fed. R. Crim. P. 32(b)(2).

7 The parties submit that a continuance to August 2025 is warranted.

8 **IV. Certificate of Conference**

9 The Government joins this motion.

10 **V. Conclusion**

11 Ms. Gehrke and the Government, based on the foregoing assertions and
12 argument, pray that this Court continue the sentencing in this case from
13 February 11, 2025, to a date in, but not later than, August 2025.

14 Date: January 31, 2025

15 Respectfully submitted,

16 s/Joshua Sabert Lowther
17 Joshua Sabert Lowther, Esq.

18

19

20

21

22

23

24

25

26

27

28